

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Rajah Morris

Case No.

19-1771-m

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 22, 2018 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Title 18, United States Code,  
Section 1343

Offense Description

Wire fraud

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Michael C Brown, Special Agent, US Secret Service

Printed name and title

Sworn to before me and signed in my presence.

Date:

10.22.19

Judge's signature

City and state:

Philadelphia, PA

Hon Timothy R Rice, U S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Michael C. Brown, being duly sworn, depose and state as follows:

1. I have been a Special Agent with the United States Secret Service since April 2018. I am currently assigned to the Philadelphia Field Office where I investigate financial fraud crimes to include credit card fraud, bank fraud, and identity theft. I am a graduate of the Federal Law Enforcement Criminal Investigator Training Program (CITP) in Glynco, Georgia. Prior to joining the Secret Service as a Special Agent, I was a Federal Law Enforcement Officer with the Federal Air Marshal Service for 10 years and a graduate of the Federal Law Enforcement Academy in Artesia, New Mexico. Prior to joining the Federal Air Marshal Service, I was an Associate at NAI Geis Realty Group, Inc. I have a Bachelor's Degree from Temple University of Philadelphia, PA in Communications.

2. This affidavit does not include every fact known to me concerning this investigation, but is submitted in support of an application for an Arrest Warrant for RAJAH MORRIS. Based on the information obtained during this investigation, as detailed below, there is probable cause to believe that RAJAH MORRIS and others have engaged in an orchestrated scheme to fraudulently obtain money. As demonstrated herein, I believe there is probable cause to believe that RAJAH MORRIS and others committed wire fraud via the electronic submission of a fraudulent insurance claim, in violation of 18 U.S.C. § 1343.

3. The information contained within this affidavit is based on my personal observations, training, experience, and information related to myself and other law enforcement officers from the United States Postal Inspection Service (USPIS) and Pennsylvania State Police (PSP) by RAJAH MORRIS during a post-Miranda warnings interview conducted on Tuesday, September 3, 2019 at Curran-Fromhold Correctional Facility (CFCF), 7901 State Road, Philadelphia PA 19136. The information in this affidavit is also based on interviews of others familiar with MORRIS's criminal associate MARK GREEN and the fraudulent insurance claim described herein.

4. On April 9, 2019, MARK GREEN was arrested by federal law enforcement officers for fraud charges unrelated to those described in this affidavit. Since that date, GREEN has been in federal custody at the Philadelphia Federal Detention Center.

INVESTIGATIVE FINDINGS

5. RAJAH MORRIS advised that he knew MARK GREEN and identified the latter from a photograph. MORRIS admitted that he engaged in criminal activity with MARK GREEN, specifically within the last few years. MORRIS stated that GREEN previously took care of him when MORRIS was hospitalized due to an addiction to heroin; GREEN visited MORRIS and provided MORRIS with clothes and clean laundry.

6. As part of the investigation of the criminal activity that RAJAH MORRIS engaged in with MARK GREEN, MORRIS was presented documents that disclosed the title history for a 2008 Lincoln, VIN #2LNHM85W58X651944. MORRIS indicated that the signatures for "Rajah Morris," appearing on a Computerized Vehicle Registration Pennsylvania Department of Transportation Applicant Summary Statement, a Certificate of Title for a Vehicle issued by the Commonwealth of Pennsylvania, and Assignment/Re-Assignment of Title which contained a Notary Seal from B.O., were not signed by him. MORRIS stated that a copy of a driver's license with an address of Osage Avenue in Philadelphia was old, but had belonged to him. MORRIS stated that a Pennsylvania Financial Responsibility Identification Card issued to "Rajah Morris, 1979 Renovo Street, Philadelphia PA 19138," indicating State Farm Automobile Insurance, was not his and that he knew the address appearing on the card belonged to GREEN. MORRIS denied that he ever resided at 1979 Renovo Street in Philadelphia. [During the investigation, law enforcement officers obtained a "Driver's License/Photo ID Information" webpage illustrating "Step 3" in finalizing the request to change the address on MORRIS' Pennsylvania Driver's License from the address on Osage Avenue to 1979 Renovo Street.]

7. Regarding the Computerized Vehicle Registration Pennsylvania Department of Transportation Applicant Summary Statement for a 2008 Lincoln, VIN #2LNHM85W58X651944, MORRIS stated that he did not own this vehicle and did not go to Brenda's Auto Tags in Philadelphia on 09/18/2018 to register said vehicle. MORRIS stated that he never saw the State Farm Automobile Insurance card before. MORRIS recalled driving a beige Lincoln Navigator that belonged to MARK GREEN at some point in time. [Based on information obtained during this investigation, your affiant has reason to believe that a fraudulent insurance claim was made regarding this vehicle by MARK GREEN.]

8. MORRIS provided details regarding a carjacking that he reported to the City of Philadelphia Police Department on 04/22/2018, involving a 2017 Land Rover, Tag KRW4794, VIN SALGS5FE9HA325852. MORRIS stated that MARK GREEN came to him and said he needed MORRIS to report a robbery of a Land Rover. GREEN said that once the insurance money would come through that he (GREEN) would provide MORRIS with a motorcycle, apartment, and cash in his pocket. MORRIS decided to return the favor to GREEN due to the generosity GREEN had provided to MORRIS during their relationship, so MORRIS followed directions provided to him by GREEN. Per those directions, MORRIS contacted the City of Philadelphia Police Department's 16th District and falsely claimed that he had been carjacked. MORRIS told the police that he had been targeted because of the car and provided the police with information regarding the vehicle and the direction that the carjackers had fled with the vehicle. MORRIS told the police that he resided at 624 N. Frasier Street, Philadelphia, PA 19131. None of the details that he provided to the police about the purported robbery or the address that he provided were true. Also, MORRIS never saw the subject vehicle. MORRIS advised that GREEN sat in a Chinese restaurant close to 41st Street and Lancaster Avenue and watched MORRIS when he reported the robbery to the police.

9. MORRIS stated that State Farm Automobile Insurance contacted MARK GREEN after the reported carjacking. GREEN had MORRIS return the telephone call to State Farm and told MORRIS, "Not to f\*\*\* it up." During the telephone call, MORRIS provided details regarding the purported carjacking. GREEN listened in on the call and interjected in the call a couple of times, but MORRIS does not believe that the State Farm representative heard GREEN. During the call, MORRIS responded to questions about the insurance claim made on the purportedly stolen Land Rover. MORRIS stated that he did not receive a check or any monies from State Farm Automobile Insurance as the result of the purported carjacking.

10. State Farm's claims representative has confirmed that on 04/22/2018, State Farm, which has its servers located in Bloomington, Illinois, received an online claim from RAJAH MORRIS for the theft of the subject Land Rover. The representative also confirmed that MORRIS provided a mailing address of 1818 N. 18<sup>th</sup> Street, Philadelphia, PA.

11. On or about July 31, 2018, State Farm issued a check totaling approximately \$106,000 payable to RAJAH MORRIS. The check was mailed to MORRIS at 1818 N. 18<sup>th</sup> Street, Philadelphia, PA.

12. Based on information received during this investigation from the United States Probation Office, your affiant has learned that 1818 N. 18<sup>th</sup> Street, Philadelphia, PA is the address that MARK GREEN provided as his residence and where he met with his probation officer in 2018, at the time that State Farm mailed a check to 1818 N. 18<sup>th</sup> Street, Philadelphia, PA.

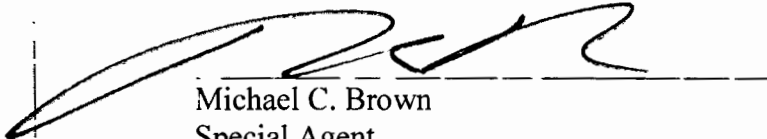
13. MARK GREEN fraudulently obtained the State Farm Automobile Insurance check for approximately \$106,000 and deposited it into his personal bank account.

14. State Farm's claims representative has also confirmed that after issuing the \$106,000 check payable to RAJAH MORRIS, they conducted an investigation and learned that the subject 2017 Land Rover was repossessed by a lienholder prior to the date of the purported carjacking and even prior to the issuance of the insurance policy to MORRIS.

CONCLUSION

15. Based on the foregoing facts, my training, experience, and discussions with other law enforcement officers involved in this investigation, your affiant submits that there is probable cause to believe that RAJAH MORRIS and other individuals have committed wire fraud via the electronic submission of a fraudulent insurance claim, in violation of 18 U.S.C. § 1343.

Respectfully Submitted,

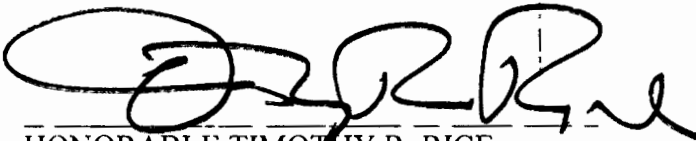


Michael C. Brown  
Special Agent  
U.S. Secret Service

Subscribed and sworn to

before me on October 22, 2019

BY THE COURT:



HONORABLE TIMOTHY R. RICE  
United States Magistrate Judge